

# EXHIBIT A



Kirkpatrick & Lockhart Nicholson Graham LLP

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June 13, 2006

Aimée E. Bierman

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abierman@klmg.com

**By E-Mail and Facsimile**

Benjamin M. Wattenmaker, Esq.  
Shipman & Goodwin LLP  
One Constitution Plaza  
Hartford, CT 06103-1919

**Re: In re Pharmaceutical Industry Average Wholesale Price Litigation  
MDL 1456**

Dear Ben:

I am writing to request the original, signed copy of the Declaration of Darlene Murphy, a copy of which was sent to Nick Mizell at Shook Hardy & Bacon L.L.P. via facsimile and e-mail on June 5, 2006. Please send the original, signed declaration to Nick Mizell at his Kansas City, Missouri office via overnight courier tonight for delivery to his office tomorrow, Wednesday, June 14, 2006.

Also, I wanted to reiterate our request for NHIC's internal and external guidelines for processing Medicare Part B reimbursement payments, which NHIC had previously offered to produce by June 5, 2006, as set forth in the proposed order NHIC filed with the Court on May 11, 2006 (Docket Entry No. 2556). Please let me know when we can expect to receive these documents.

Very truly yours,

Aimée E. Bierman

AEB/gmf

cc: Gary S. Starr, Esq. (By E-Mail and Facsimile)  
James P. Muehlberger, Esq. (By E-Mail)  
Michael DeMarco, Esq. (By E-Mail)  
Michael D. Ricciuti, Esq. (By E-Mail)  
Nicholas P. Mizell, Esq. (By E-Mail)  
Leslie M. Stafford, Esq. (By E-Mail)  
Andy J. Mao, Esq. (By E-Mail)

BOS-978978 v1 5544510-0903

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## EXHIBIT B



Kirkpatrick & Lockhart Nicholson Graham LLP

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June 28, 2006

Aimée E. Bierman

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**By E-Mail and Facsimile**

Benjamin M. Wattenmaker, Esq.  
Shipman & Goodwin LLP  
One Constitution Plaza  
Hartford, CT 06103-1919

**Re: In re Pharmaceutical Industry Average Wholesale Price Litigation  
MDL 1456**

Dear Ben:

On June 13, 2006 I wrote to you to reiterate Aventis' request for NHIC's internal and external guidelines for processing Medicare Part B reimbursement payments, which NHIC had previously offered to produce by June 5, 2006, as set forth in the proposed order NHIC filed with the Court on May 11, 2006 (Docket Entry No. 2556).

It has now been 23 days since June 5, 2006, the date by which NHIC offered to produce these documents and 15 days since my last request to you regarding these materials, to which you have not responded. If we do not receive these materials by July 3, 2006 we will be forced to immediately refer this issue to Magistrate Bowler to further compel discovery on this issue and seek any other relief as necessary.

If you would like to discuss this matter, please feel free to contact me.

Very truly yours,

A handwritten signature in cursive script, appearing to read 'AEB'.

Aimée E. Bierman

AEB/gmf

cc: Gary S. Starr, Esq. (By E-Mail and Facsimile)  
James P. Muehlberger, Esq. (By E-Mail)  
Michael DeMarco, Esq. (By E-Mail)  
Michael D. Ricciuti, Esq. (By E-Mail)  
Nicholas P. Mizell, Esq. (By E-Mail)  
Leslie M. Stafford, Esq. (By E-Mail)  
Andy J. Mao, Esq. (By E-Mail)

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